## O'NEILL / HASSEN

Attorneys at Law

## **USDC SDNY DOCUMENT ELECTRONICALLY FILED**

DATE FILED:

April 20, 2021

## MEMORANDUM ENDORSED

VIA ECF and Email Honorable Gregory H. Woods United States District Judge United States Courthouse 500 Pearl Street New York, NY 10007

RE: United States v. Lorry Gonzalez, 20 Cr. 425 (GHW)

Dear Judge Woods:

I am writing to request that the Court modify Ms. Gonzalez's bail to allow her to move to a new apartment. The new apartment is in the same complex as her current apartment in Cherry Hill, NJ.

I appreciate the Court's attention to this matter.

Application denied without prejudice. First, counsel Respectfully submitted, is directed to specify the condition of Mr. Gonzalez's release that requires modification. To the extent that evaluation leads counsel to conclude that no Court intervention is necessary, counsel need not renew the request. Second, to the extent that a modification of the defendant's release conditions is requested by the defendant, the defendant is directed to include in her request to the Court a statement stating the position of both her supervising officer and the United States Attorney's Office regarding the request.

Grainne E. O'Neill

/s/

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 34.

SO ORDERED.

Dated: April 20, 2021 New York, New York

United States District Judge

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